

UNITED STATES DISTRICT COURT NORTH DAKOTA
WESTERN DIVISION

Howard J. Miller, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 1:20-cv-00132-DMT-CRH
)	
Juárez Cartel a/k/a Vicente Carrillo)	
Fuentes Organization (a/k/a/ “CFO”) a/k/a)	
La Línea,)	
)	
Defendant.)	
)	

**PLAINTIFFS’ MOTION FOR ENTRY OF CONSENT PROTECTIVE AGREEMENT
AND ORDER**

Pursuant to Local Civ. R. 1.7 and 7.1(B), Plaintiffs respectfully request that the Court review and approve the proposed Protective Agreement and Order appended to this motion as Exhibit A. On June 24, 2022, a Judgment in a Civil Case was entered by the Court following a damages trial and subsequent entry of Findings of Fact and Conclusions of Law by the Court. *See* ECF No. 64. In furtherance of Plaintiffs’ attempts to collect upon the judgment entered by the Court, Plaintiffs served subpoenas on non-parties JPMorgan Chase Bank, N.A. (“JPMCB”) and The Bank of New York Mellon (“BNY Mellon”) on April, 27, 2023, and May 18, 2023, respectively. *See* Ex. A at 1. To allow Plaintiffs to assess the responsive documents to be produced by JPMCB and BNY Mellon, Plaintiffs and the non-parties have stipulated and agreed to permit the non-parties to designate “Confidential Information” in their production as “CONFIDENTIAL” where the non-party banks believe in good faith that such designated material constitutes or reveals: (i) confidential trade secrets, proprietary business information, non-public personal, client, or customer information concerning individuals or other entities or items; or (ii) information protected from disclosure by any relevant federal, state or foreign data-protection laws.” *See* Ex.

A at ¶2. Plaintiffs are satisfied at this time that any restraints or obligations imposed on them by this Protective Agreement and Order are reasonable pending a review by counsel of any documents produced with the “CONFIDENTIAL” designation.

Therefore, Plaintiffs respectfully request that Court “So Order” the appended Protective Agreement and Order to permit Plaintiffs to review those documents that are responsive to the subpoenas and in possession of non-parties JPMCB and BNY Mellon.

Dated: June 23, 2023

Respectfully submitted,

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